

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

UNITED STATES OF AMERICA	:	CRIMINAL NO.
v.	:	DATE FILED:
JANICE GURCZESKI	:	VIOLATION:
	:	18 U.S.C. § 641 (conversion of
	:	government funds – 1 count)
		Notice of forfeiture

INFORMATION

COUNT ONE

(Conversion of Government Funds)

THE UNITED STATES ATTORNEY CHARGES THAT:

At all times material to this information:

1. The Social Security Administration (“SSA”), an agency of the United States, administered certain government benefit programs, including the Retirement Insurance Benefits (“RIB”) program, pursuant to Title 42, United States Code, Sections 401-433.
2. The RIB program was an earned-right program funded through Social Security wage taxes. When an individual worked, that individual paid taxes on his or her wages into the Social Security trust fund. If that individual paid sufficient Social Security taxes to earn sufficient “credits,” as that term was defined for purposes of the Social Security Act, he or she was eligible to receive retirement benefits upon reaching a certain age.
3. RIB payments continued until the individual died.
4. Defendant JANICE GURCZESKI’s father, identified herein as “E.G.,” received RIB benefits during his lifetime. No other individual was entitled to the benefits

designated for E.G., and the benefits were to be suspended upon the death of E.G. The SSA provided these benefits through an electronic funds transfer to a bank account at Provident Bank held in the names of E.G and defendant GURCZESKI (hereafter the “Provident Bank account”).

5. E.G. died on or about January 4, 2001.

6. SSA had no record of timely notification of E.G.’s death and continued to issue RIB benefits through an electronic funds transfer to the Provident Bank account.

7. Defendant JANICE GURCZESKI improperly converted the benefit payments in the Provident Bank account for her own use.

8. From in or about February 2001 to in or about July 2019, defendant JANICE GURCZESKI improperly converted to her own use approximately \$196,884.00 in SSA benefit payments intended for E.G.

9. Beginning in or about February 2001, and continuing through in or about July 2019, in the Eastern District of Pennsylvania and elsewhere, defendant

JANICE GURCZESKI

knowingly converted to her own use, money of the United States in excess of \$1,000, that was, approximately \$196,884.00 in SSA benefits to which the defendant knew she was not entitled.

In violation of Title 18, United States Code, Section 641.

NOTICE OF FORFEITURE

THE UNITED STATES ATTORNEY FURTHER CHARGES THAT:

1. As a result of the violation of Title 18, United States Code, Section 641, set forth in this information, defendant

JANICE GURCZESKI

shall forfeit to the United States of America any property, real or personal, that constitutes or is derived from proceeds traceable to the commission of such offense; including but not limited to the sum of \$196,884.00.

2. If any of the property subject to forfeiture, as a result of any act or omission of the defendant:

- (a) cannot be located upon the exercise of due diligence;
- (b) has been transferred or sold to, or deposited with, a third party;
- (c) has been placed beyond the jurisdiction of the Court;
- (d) has been substantially diminished in value; or
- (e) has been commingled with other property which cannot be divided without difficulty;

it is the intent of the United States, pursuant to Title 28, United States Code, Section 2461(c), incorporating Title 21, United States Code, Section 853(p), to seek forfeiture of any other property of the defendant(s) up to the value of the property subject to forfeiture.

All pursuant to Title 28, United States Code, Section 2461(c), and Title 18, United States Code, Section 981(a)(1)(C).


JACQUELINE C. ROMERO
United States Attorney

No. _____

UNITED STATES DISTRICT COURT

Eastern District of Pennsylvania

Criminal Division

THE UNITED STATES OF AMERICA

vs.

JANICE GURCZESKI

INFORMATION

Count

18 U.S.C. § 641 (conversion of government funds – 1 count)

Notice of forfeiture

A true bill.

Foreperson

Filed in open court this _____ day,
Of _____ A.D. 20 _____

Foreperson

Bail, \$ _____
